

EXHIBIT M

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20 differences in content, page and line numbers,
21 punctuation, and formatting.

22 MS. PERALES: For the Lupe please
23 LUPE.

24 MS. HOLMES: Jennifer Holmes for the
25 haul plaintiff HAUL's then presenting the state of

1 Texas.

2 MR. GORE: Representing intervenors
3 defendant and the witness today Siegel Siegel SIEGEL
4 chairman of the Harris County Republican Party.

5 CINDY SIEGEL,

6 Having been first duly sworn, was examined and
7 testified as follows:

8 THE REPORTER: Counsel, we're ready to
9 proceed.

10 MS. PERALES: Thank you.

11 DIRECT EXAMINATION

12 BY MS. PERALES:

13 You can tell we're all.

14 Q. As you heard earlier my name is Nina Perales
15 and I represent some of the plaintiff's in this case.
16 I'll start off with some pretty easy questions the
17 first being have you ever been deposed before?

18 A. No.

19 Q. So because you haven't been deposed before
20 I'm going to go through some rules with you rule of the
21 road essentially and I'll just ask you for each one of
22 them if you can agree to do that in today's deposition
23 okay?

24 A. Okay.

25 Q. All right. Now you just a moment ago you took

1 bill called Senate bill 7 and later in the second
2 special session the bill that passed was called SB 1,
3 is that generally you understanding of things?
4 A. Yes, but I'm more familiar quite frankly with
5 just SB 1.

6 Q. So before the regular session started in
7 January of 2021, did you have any involvement in
8 advocating for legislation similar to SB 1, this is
9 before the start of the session?

10 A. My personally.

11 Q. The party?

12 A. Through our ballot security committee and
13 our, under Al Vera as the chair. We did pass a
14 resolution our executive committee which is made up of
15 all the precinct chairs and I think it was in January
16 basically saying that the ballot security commit could,
17 I'm not going to say act, but represent Harris County
18 Republican Party and it laid out certain things that we
19 were for and certain things we were against. But in
20 terms of, me advocating or the party sending a bus or
21 whatever, no, we did not do any of that.

22 Q. Okay. Would it be fair to say that Mr. Vera
23 carried out most of the advocacy or all of the advocacy
24 on voter integrity legislation in the 2021 sessions?

25 A. Yes.

1 A. No.

2 Q. Okay. Now I have some more questions for you
3 about the parties advocacy in the 2021 legislative
4 sessions both the regular the first and the second
5 special it was a long year?

6 A. Yes it was.

7 Q. And so I'll continue to ask you those
8 questions but if it's the case that Mr. Vera was
9 carrying out the par's activities then that's okay to
10 just let me know that?

11 A. Okay.

12 Q. But if there were other things that the party
13 was doing to advocate, please let me know that as well?

14 A. Okay.

15 Q. And before I launch into those, I just wanted
16 to be clear that when Mr. Vera was carrying out his
17 advocacy on behalf of the Harris County Republican
18 Party, are you aware that sometimes he would use his
19 company email to communicate with legislators and
20 others?

21 A. Yes, I'm aware of that.

22 Q. And is it typically the case that he uses his
23 company email for email communications?

24 A. It has been historically the case, it is
25 something we've internally recently are moving away

1 from that, to where that there will be a party email

2 like I have.

3 Q. In 2021 did Mr. Vera have a party email?

4 A. No, no.

5 Q. So any email he would have been doing on

6 behalf of the republican party would have been through

7 his personal email?

8 A. Yes.

9 Q. Does Mr. Vera have a computer that the party

10 gave him to do his work on behalf the party?

11 A. No.

12 Q. So is it your understanding that Mr. Vera

13 uses his personal Company computer to his advocacy on

14 behalf of the party?

15 A. Yes.

16 Q. I think I know the answer to this question,

17 but did, you, Cindy Siegel testify in favor or against

18 SB 1 in the legislature?

19 A. No.

20 Q. Did you ever, are you aware of any meetings

21 that Harris County Republican Party had with

22 legislators on SB 1 that didn't include Mr. Vera?

23 MR. SZUMANSKI: Objection to the

24 extent it infringes or invades the legislative

25 privilege or extends into the inquires from the

1 legislatures?

2 MS. PERALES: Your objection is noted.

3 I'm carefully asking at this point only if whether
4 meetings occurred and not the substance of those
5 communications.

6 MR. SZUMANSKI: Understood.

7 A. Can you repeat the question?

8 Q. (BY MS. PERALES) Yes. Did the Harris County
9 Republican Party have any meetings with legislators
10 about SB 1 that didn't include Mr. Vera?

11 A. Not to my knowledge.

12 Q. Now, earlier you testified that the 2021
13 resolution of the party election integrity legislation
14 was provided to legislators, can you think of any other
15 documents that the Harris County Republican Party sent
16 to legislators related to election integrity during the
17 2021 period?

18 MR. SZUMANSKI: Objection, legislative
19 privilege?

20 Q. (BY MS. PERALES:) You may answer.

21 A. Not related to SB 1, but in response to a
22 text I received.

23 Q. So you received a text from a legislator or
24 legislative staff and you responded?

25 A. Yes.

1 County Republican Party had with legislators about SB 1
2 that was not involving Mr. Vera, so outside of Vera's
3 communications --

4 MR. SZUMANSKI: Objection, legislative
5 privilege.

6 MS. PERALES: You're objection is
7 noted. Again, if I ask merely about the existence of
8 communications, I believe we're still on safe ground.

9 MR. SZUMANSKI: Understood, but to the
10 extent it does invade into any content or substance of
11 communications then I'm going to instruct the witness
12 not to answer, but I appreciate your clarification.

13 Q. (BY MS. PERALES:) Okay. Do you need the
14 question again?

15 A. Please.

16 Q. Putting aside the video about poll watcher
17 recruitment, can you think of any other communications
18 that Harris county republican party had with
19 legislators or staff about SB 1 that didn't include
20 Mr. Vera?

21 A. Not to my recollection.

22 Q. My understanding from Mr. Vera is that at the
23 the beginning of the 2021 legislative session there may
24 have been a luncheon here in Harris County, with Harris
25 county electeds at the beginning of the legislative